

1 GLYNN & FINLEY, LLP
 ANDREW T. MORTL, Bar No. 177876
 2 ADAM FRIEDENBERG, Bar No. 205778
 One Walnut Creek Center
 3 100 Pringle Avenue, Suite 500
 Walnut Creek, CA 94596
 4 Telephone: (925) 210-2800
 Facsimile: (925) 945-1975
 5 amortl@glynnfinley.com
afriedenberg@glynnfinley.com

6 Attorneys for Defendant GTE Mobilnet
 7 of California Limited Partnership d/b/a
 Verizon Wireless (erroneously sued and
 8 referred to herein as “Verizon Wireless”)

9
 10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

13 JANET PICKENS,)	Case No. CV-08-00004 MMC
)	
14 Plaintiff,)	<u>DEFENDANT GTE MOBILNET OF</u>
)	<u>CALIFORNIA LIMITED</u>
15 vs.)	<u>PARTNERSHIP’S SECOND REQUEST</u>
)	<u>FOR JUDICIAL NOTICE IN SUPPORT</u>
16 VERIZON WIRELESS,)	<u>OF ITS MOTION TO DISMISS</u>
)	<u>PLAINTIFF JANET PICKENS’</u>
17 Defendant.)	<u>COMPLAINT</u>
18 _____)	Date: February 29, 2008
)	Time: 9:00 a.m.
)	Courtroom: 7
)	Before: Hon. Maxine M. Chesney

20
 21 Defendant GTE Mobilnet of California Limited Partnership doing business as Verizon
 22 Wireless (erroneously sued and referred to herein as “Verizon Wireless”) requests pursuant to
 23 Federal Rules of Evidence, Rule 201, that the Court take judicial notice of the following orders
 24 of the Superior Court of California, County of San Francisco: 1) Order finding Janet Stanford
 25 (a/k/a Janet Pickens and Janet Pickens-Stanford) a vexatious litigant (attached hereto as **Exhibit**
 26 **H**); and 2) Prefiling Order—Vexatious Litigant (attached hereto as **Exhibit I**). As such
 27 documents are “matters of public record” judicial notice is appropriate. See *Lee v. City of Los*
 28 *Angeles*, 250 F.3d 668, 689 (9th Cir. 2001). Verizon Wireless was unaware of these orders at the

1 time it filed its motion to dismiss Plaintiff's Complaint, and accordingly submits this
2 supplemental request for judicial notice in support of that motion.

3 Dated: January 22, 2008

4 GLYNN & FINLEY, LLP
5 ANDREW T. MORTL
6 ADAM FRIEDENBERG
7 One Walnut Creek Center
8 100 Pringle Avenue, Suite 500
9 Walnut Creek, CA 94596

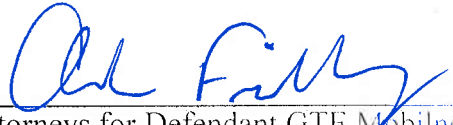
10 By 
11 Attorneys for Defendant GTE Mobilnet
12 of California Limited Partnership d/b/a
13 Verizon Wireless (erroneously sued and
14 referred to herein as "Verizon Wireless")
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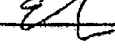
EXHIBIT H

JASON J. CURLIANO, State Bar No. 167509
 KHALED TAQI-EDDIN, State Bar No. 220923
 BUTY & CURLIANO LLP
 555 City Center – 555 12th Street, Suite 1280
 Oakland, California 94607
 Telephone: (510) 267-3000
 Facsimile: (510) 267-0117

FILED
 San Francisco County Superior Court

DEC 03 2007

GORDON PARK-LI, Clerk

BY:  Deputy Clerk

Attorneys for Defendants
 KAISER FOUNDATION HOSPITALS
 (erroneously sued as KAISER FOUNDATION
 HOSPITALS – HUMAN RESOURCES)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE CITY AND COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION

JANET STANFORD,

Plaintiff,

v.

KAISER FOUNDATION HOSPITALS, and
 DOES 1 through 1,

Defendant.

Case No. CGC-07-467638

~~PROPOSED~~ ORDER AFTER
 HEARING ON DEFENDANT KAISER
 FOUNDATION HOSPITALS MOTION
 TO DECLARE PLAINTIFF JANET
 STANFORD A VEXTIOUS LITIGANT;
 REQUEST FOR PREFILING ORDER
 AND ORDER REQUIRING PLAINTIFF
 TO FURNISH SECURITY

Date: December 3, 2007

Time: 9:30 a.m.

Dept: 302

Complaint filed: September 27, 2007

Trial Date: None

Defendant Kaiser Foundation Hospitals ("Kaiser"), erroneously sued as Kaiser Foundation Hospital-Human Resources, motion to declare plaintiff Janet Stanford a vexatious litigant, for an order requiring plaintiff to furnish security, and for an order requiring pre-filing review of plaintiff's future pleadings came on for hearing on ~~November 25~~ ^{December 3}, 2007 at 9:30 a.m. in Department of 302 of the above-entitled Court, the Honorable Patrick J. Mahoney presiding.

Having considered all of the evidence set forth in the moving, opposing, and reply papers and after considering the arguments of the parties, the Court finds the following:

1. Plaintiff Janet Stanford is a vexatious litigant as defined by Code of Civil Procedure §§ 391 (b)(1) for commencing, prosecuting, or maintaining, in propria persona the following litigations determined adversely to her in the last seven years: Stanford v. Kaiser, San Mateo

County Superior Court Case No. CIV457986; Stanford v. Kaiser, Alameda County Superior Court Case No. RG06291437; Stanford v. Kaiser, et al., Alameda County Superior Court Case No. RG06300992; Stanford v. Jones, et al., San Francisco County Superior Court Case No. CCH-07-566509; Stanford v. Rothschild, San Francisco County Superior Court Case No. CGC-06-456815; Stanford v. Donlin, San Francisco County Superior Court Case No. CGC-06-456817; Stanford v. Saucedo, San Francisco County Superior Court Case No. CGC-06-457664; and Stanford v. Baisley, San Francisco County Superior Court Case No. CGC-06-459051.

2. Plaintiff Janet Stanford is a vexatious litigant as defined by Code of Civil Procedure §§ 391 (b)(3) for engaging in tactics that were frivolous and solely intended to cause unnecessary delay of litigation by seeking a temporary restraining order against counsel for Kaiser; Stanford v. Jones, et al., San Francisco County Superior Court Case No. CCH-07-566509.

3. Pursuant to Code of Civil Procedure § 391.1, Kaiser has shown that there is not a reasonable probability that the plaintiff will prevail against them in this litigation.

Accordingly, it is hereby ORDERED ADJUDGED, and DECREED:

1. Kaiser's motion to determine plaintiff Janet Stanford a vexatious litigant is GRANTED;

2. Kaiser's motion to require plaintiff to furnish security is GRANTED. There is no reasonable probability that plaintiff will prevail in this litigation. Plaintiff shall furnish security in the amount of \$1,000.00 on or before December 15, 2007 or this action will be dismissed with prejudice. All other matters in this litigation are ordered STAYED until the plaintiff furnishes security. All previously calendared hearings are off calendar unless the court so orders;

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1 3. Kaiser's motion for a pre-filing review of all new litigation filed by the plaintiff in
2 the State of California is GRANTED. The Court enters a pre-filing order prohibiting plaintiff from
3 filing any new litigation in propria persona without first obtaining leave of the presiding judge.
4 The pre-filing order shall be issued against Janet Stanford (a.k.a Janet Pickens and Janet Pickens-
5 Stanford) and a copy shall be provided to the Judicial Council.
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8 DATED: Dec 3, 2007

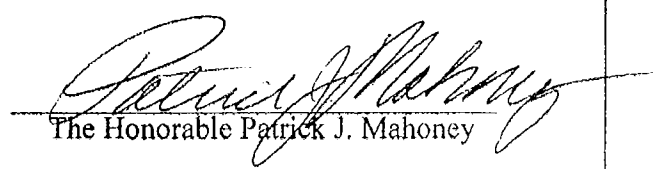

The Honorable Patrick J. Mahoney

EXHIBIT I

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): (To be completed only if a party is making the motion) Jason J. Curliano (167509); Khaled Taqi-Eddin (220923) Buty & Curliano LLP 555 12th Street, Suite 1280 Oakland, CA 94607 ATTORNEY FOR (Name): Defendant Kaiser Foundation Hospitals	PHONE NO.: (510) 267-3000 FAX NO.: (510) 267-0117	FOR COURT USE ONLY ENDORSED FILED San Francisco County Superior Court DEC - 5 2007 GORDON PARK-LI, Clerk BY: AUDREY HUIE Deputy Clerk
INSERT NAME OF COURT, JUDICIAL DISTRICT, AND BRANCH COURT, IF ANY, AND MAILING AND STREET ADDRESS: SUPERIOR COURT OF CALIFORNIA, SAN FRANCISCO COUNTY 400 McAllister St. San Francisco, CA 94112		CASE NUMBER: CGC-07-467638
CASE NAME: Janet Stanford v. Kaiser Foundation Hospitals - Human Resources		
PREFILING ORDER—VEXATIOUS LITIGANT		

- Name and address of plaintiff(s) or cross-complainant(s) who is subject to this prefiling order:
 Janet Stanford (a.k.a. Janet Pickens and Janet Pickens-Stanford)
 60 Cashmere St., #1A
 San Francisco, CA 94124
- This prefiling order is entered pursuant to a motion made by ☐ the court ☒ party (name):
 Kaiser Foundation Hospitals
- The individual(s) mentioned in item 1 is prohibited from filing any new litigation in propria persona in the courts of California without approval of the presiding judge of the court in which the action is to be filed.
- The clerk is ordered to provide a copy of this order to the California Judicial Council by fax at (415) 865-4329 or by mail at the address below.

Vexatious Litigant Prefiling Orders
 California Judicial Council
 Administrative Office of the Courts
 455 Golden Gate Avenue
 San Francisco, California 94102-3688

Date: DEC 05 2007

PATRICK J. MAHONEY

JUDGE
 JUDGE OF THE SUPERIOR COURT

(Bottom fold line if using a window return envelope)

Docket No. CV-08-00004 MMC
PROOF OF SERVICE BY MAIL

I, Beverly Carter, the undersigned, hereby certify and declare under penalty of perjury that the following statements are true and correct:

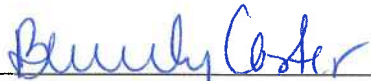
1. I am over the age of 18 years and am not a party to the within cause.
2. My business address is One Walnut Creek Center, 100 Pringle Avenue, Suite 500, Walnut Creek, CA 94596.
3. I am familiar with my employer's mail collection and processing practices; know that said mail is collected and deposited with the United States Postal Service on the same day it is deposited in interoffice mail; and know that postage thereon is fully prepaid.
4. Following said practice, on January 22, 2008 I served a true and correct attached document entitled exactly:

**DEFENDANT GTE MOBILNET OF CALIFORNIA LIMITED
PARTNERSHIP'S SECOND REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF ITS MOTION TO DISMISS PLAINTIFF JANET
PICKENS' COMPLAINT**

by placing said document in an addressed, sealed envelope and depositing it in regularly maintained interoffice mail to the following:

**Janet Pickens
60 Cashmere Street, #1A
San Francisco, CA 94124
(415) 648-1579**

Executed this 22nd day of January, 2008 at Walnut Creek, California.


Beverly Carter